

Exhibit 164

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

This Document Relates To:

Authenticom, Inc. v. CDK Global, LLC,
No. 18-868 (N.D. Ill.)

MDL No. 2817
Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

DECLARATION OF STEPHEN COTTRELL

I, Stephen Cottrell, have personal knowledge of the information contained herein and declare as follows:

1. I am the founder, owner, and Chief Executive Officer of Authenticom, Inc. (“Authenticom”), based in La Crosse, Wisconsin.
2. I submit this declaration in support of Authenticom’s Motion for Summary Judgment on Defendants’ Counterclaims. I could and would testify to the matters described below at any trial in this matter.
3. As I have stated previously, Authenticom only accesses a dealer’s data with the express, written authorization of the dealer, using login credentials that the dealer creates and provides to Authenticom.
4. Dealers can revoke the login credentials they provide to Authenticom at any time. If a dealer does so, Authenticom’s access to the dealer’s DMS database is shut off and Authenticom has no ability to access the DMS.
5. Dealers control the permissions associated with Authenticom’s login credentials. Dealers can limit Authenticom’s access credentials to the performance of specific functions for specific file types. For example, dealers can give Authenticom permission to extract and/or write back sales, service, or inventory data (or some combination of those three).

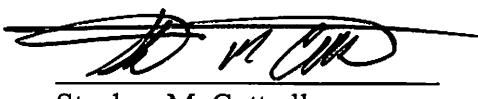
6. Authenticom's DealerVault platform provides dealers with complete transparency and control over which data Authenticom accesses on the DMS database, the vendors for which Authenticom facilitates access to data on the DMS (and the precise data fields for each vendor), and when vendors receive access to that data.

7. Dealers control the categories of data in the DMS database that Authenticom accesses. For example, dealers can choose to have Authenticom access to inventory data but not sales data.

8. Through the DealerVault online portal, dealers also control which data categories and data fields Authenticom delivers to specific vendors. For example, through an easy-to-use drop-down menu, dealers can direct Authenticom to send sales data to one vendor and service data to another vendor. Within data categories, dealers also can control which data fields go to which vendors. For example, a dealer may direct Authenticom to send one vendor inventory data fields including year, make, model, and color, while limiting another vendor to inventory data that only includes the model and year data fields.

9. Through the DealerVault online portal, dealers control the frequency with which Authenticom distributes the dealer's data to vendors. For example, dealers can choose to have Authenticom provide data integration services at multiple intervals during the day, once at night, once a week, or even once a month depending on the dealer's needs for a particular vendor. Dealers can set the frequency of data integration on a vendor-by-vendor basis, so that some vendors receive data more frequently and others less frequently.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on this 19th day of May 2020 at La Crosse, Wisconsin.



Stephen M. Cottrell